

EX PARTE OR LATE FILED

U S WEST, Inc.
Suite 700
1020 Nineteenth Street, NW
Washington, DC 20036
202 429-3131
FAX 202 296-5157

USWEST

BB Nugent
Executive Director
Federal Regulatory

EX PARTE

March 17, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 - 12th Street, SW, TW A-325
Washington, DC 20554

RECEIVED
MAR 17 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: CC Docket No. 96-128, Pay Telephone Reclassification and
Compensation Provisions of Telecommunications Act of 1996

Dear Ms. Salas:

On March 16, 1999, Candace Mowers and the undersigned, representing U S WEST, met with Marty Schwimmer, Network Service Division, FCC, to discuss the above-referenced proceeding. The attached document served as the basis of the discussion.

In accordance with Section 1.1206(a)(2) of the Commission's rules, an original and one copy of this letter and the attachment are being filed with your office for inclusion in the record of this proceeding.

We have served a copy on all parties in the attached Certificate of Service.

Acknowledgment and date of receipt of this submission is requested. A duplicate of this letter is provided for this purpose.

Sincerely,

BB Nugent

Attachments

cc: Mr. Marty Schwimmer

No. of Copies rec'd 041
List A B C D E

U S WEST
Flexible Automatic Number Identification (Flex ANI)

March 16, 1999



Background

- The FCC's 3/9/98 Order required U S WEST to implement Flex ANI in approximately 1, 500 switches.
- U S WEST 1/16/98 *ex parte* provided detailed Flex ANI implementation plans which included:
 - Prioritized programming & software installation by the number of payphone lines per switch
 - Mechanizing the service order process to change Line Class Codes on approximately 170,000 payphone lines
- U S WEST completed 90% deployment by 6/30/98.
- On 5/7/98, Tariff Transmittal No. 915 was filed to make Flex ANI digits available to carriers at no charge if used solely for purposes of Payphone Compensation.

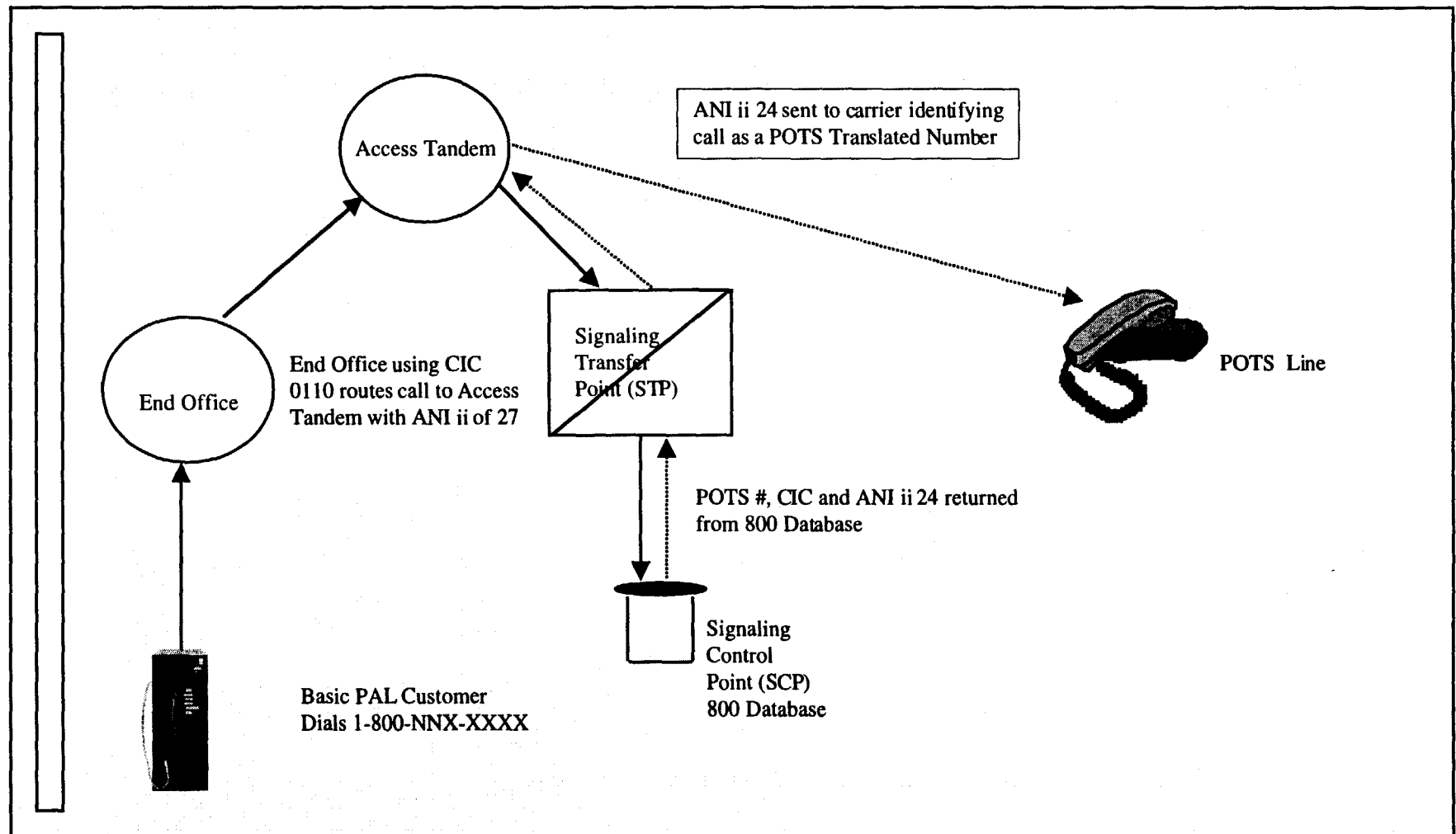
Background

- U S WEST fully deployed Flex ANI in all switches by 12/31/98, as described in the 12/11/98 *ex parte*.
- On 1/15/99, U S WEST filed Transmittal No. 963 to begin recovering the cost of Flex ANI Implementation. A Payphone Specific Digit Charge of \$2.42 went into effect on 1/31/99.

Flex ANI Technical Issues

- Two technical problems were identified in U S WEST's 12/11/98 *ex parte*.
 - Tandem Screening (Nortel) - Access tandem switches do not have the capability to identify whether an IXC is capable of receiving Flex ANI ii digits. U S WEST purchased and loaded software to correct the Tandem Screening problem.
 - 800/POTS Conversion (Nortel & Lucent) - The original end office signaled Flex ANI ii digits cannot be passed on 800-type calls routing to Plain Old Telephone Service (POTS) numbers. If the 800 database has a POTS routing number, rather than a carrier identification code (CIC), the telephone number is sent in the return query and the SSP replaces the original Flex ANI ii digits with "24" for a POTS translated call. As a result, carriers cannot identify which POTS translated calls originate from a payphone without costly changes to Flex ANI software.

Flexible ANI 800/POTS Translated Call Routing



Costs to Payphone Service Providers

(Includes only capital costs)

| Capital Cost included in 1/31/99 Tariff (Includes Nortel 800/POTS & Tandem Screening) | Capital Cost With Lucent 800/POTS | Capital Cost Without Nortel & Lucent 800/POTS |
|---|--------------------------------------|---|
| \$1.98 per PAL Line | \$3.47 per PAL Line | \$1.32 per PAL Line |

Cost/Benefit Analysis

800/POTS Software Solution

Flex ANI Capital Costs

\$3.47 per month per phone

Monthly Per Call Compensation from 800/POTS Calls

\$.24

Without 800/POTS Software

Flex ANI Capital Costs

\$1.32 per month per phone

Monthly Per Call Compensation from 800/POTS Calls

\$.00**

**It may be possible for some IXC's to track these calls using other methods.

Payphone Service Providers can save \$2.15 per month per line.

Summary

- The number of 800/POTS calls account for less than 1% of all calls originating from payphones. This works out to less than one call per month per phone.
- The IXC's that currently subscribe to U S WEST Flex ANI service do not subscribe to U S WEST 800/POTS Translations service.
- If U S WEST is required to modify its Flex ANI software to resolve the 800/POTS problem, monthly costs to the Payphone Service Providers would increase by two and one-half times.
- If the Commission finds U S WEST's existing Flex ANI service to be in compliance with its payphone orders, the Payphone Service Provider's monthly rate would decrease by one-third.

Certificate of Service

I, Doree Cordoviz, hereby certify that on this 17th day of March 1999, I caused copies of the foregoing DOCUMENT to be served upon the parties on the attached service list by first class mail.


Doree Cordoviz

Carl Northrop
Emmett A. Johnston
Paul, Hastings, Janofsky & Walker
1299 Pennsylvania Ave., NW, 10th Fl.
Washington, DC 20004-2300

Albert H. Kramer
Robert F. Aldrich
Christopher T. McGowan
Dickstein, Shapiro, Morin & Oshinsky, LLP
2101 L St. NW
Washington, DC 20037-1526

Mark C. Rosenblum
Richard H. Rubin
AT&T Corporation
295 North Maple Avenue
Room 325213
Basking Ridge, NJ 07920

Rachel J. Rothstein
Cable & Wireless, Inc.
8219 Leesburg Pike
Vienna, VA 22182

Mark MacKenzie
Citicorp Service, Inc.
8430 West Bryn Mawr Avenue
Chicago, IL 60631

Genevieve Morelli
Competitive Telecommunications Assn.
1900 M St., NW, Suite 800
Washington, DC 20036

Howard J. Symons
Sara Seidman
Yaron Dori
Mintz, Levin, Cohn, Ferris, Glovsky
and Popeo, PC
701 Pennsylvania Ave., NW
Washington, DC 20004-2608

James M. Smith
Excel Telecommunications, Inc.
1133 Connecticut Ave., NW, Suite 750
Washington, DC 20036

Michael J. Shortley III
Frontier Corporation
180 S. Clinton Avenue
Rochester, NY 14646

Glenn B. Manishin
Michael D. Specht
Blumenfeld & Cohen
Technology Law Group
1615 M St., NW, Suite 700
Washington, DC 20036

Gary L. Mann
IXC Long Distance, Inc.
1122 Capital of Texas Highway South
Austin, TX 78746

Brad E. Mutschelknaus
Steven A. Augustino
Kelley Drye & Warren, LLP
1200 19th St., NW, Suite 500
Washington, DC 20036

Mary L. Sisak
Mary L. Brown
George S. Ford
MCI Telecommunications Corp.
1801 Pennsylvania Ave., NW
Washington, DC 20006

Lawrence G. Malone
New York State State Dept. of Public Svc.
Three Empire State Plaza
Albany, NC 12223-1350

Scott Blake Harris
Kent D. Bressie
Harris, Wiltshire & Grannis, LLP
1200 18th St., NW, Suite 1200
Washington, DC 20036

Neil M. Peretz
PocketScience, Inc.
2075 de La Cruz Boulevard, Suite 200
Santa Clara, CA 95050

Thomas Gutierrez
J. Justine McClure
Lukas, Nace, Gutierrez & Sachs
1111 - 19th St., NW, Suite 1200
Washington, DC 20036

Leon M. Kestenbaum
Jay C. Keithley
H. Richard Juhnke
Sprint Corporation
1850 M St., NW, 11th Floor
Washington, DC 20036

Thomas K. Crowe
Law Offices of Thomas K. Crowe, PC
2300 M St., NW, Suite 800
Washington, DC 20037

Richard S. Whitt
Worldcom, Inc.
1120 Connecticut Ave., NW, Suite 400
Washington, DC 20036